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PROPOSED ATTORNEYS FOR DEBTORS AND
DEBTORS-IN-POSSESSION

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:

**PROTOM INTERNATIONAL, INC.
PROTOM INTERNATIONAL, LLC**

DEBTORS.

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**CASE NO. 15-32065-BJH-11
CASE NO. 15-32066-SGJ-11**

CHAPTER 11

**REQUEST FOR EMERGENCY CONSIDERATION
OF CERTAIN "FIRST DAY" MATTERS**

On May 12, 2015, ProTom International, Inc. and ProTom International, LLC filed petitions for relief under Chapter 11 of the Bankruptcy Code. Counsel for the debtors believes that the cases qualify as a "Complex Chapter 11 Case." The Debtors need emergency consideration of the following initial case matters either Wednesday afternoon, May 13, 2015, Thursday morning May 14, 2015, or as soon thereafter as the Court will allow:

 X JOINT MOTION FOR JOINT ADMINISTRATION

 MOTION FOR ORDER EXTENDING TIME TO FILE SCHEDULES AND
STATEMENT OF FINANCIAL AFFAIRS

 X MOTION RE MAINTENANCE OF BANK ACCOUNTS AND EXISTING CASH
MANAGEMENT, ATTACHING NOTICE OF CONFERENCE WITH U.S. TRUSTEE

- X MOTION TO PAY PRE-PETITION WAGES, SALARIES, *ET AL.*, ATTACHING NOTICE OF CONFERENCE WITH U.S. TRUSTEE AND DETAILED EXHIBIT SHOWING WHO DEBTOR PROPOSES TO PAY AND AMOUNTS
- MOTION FOR ENTRY OF INTERIM ORDER AUTHORIZING USE OF CASH COLLATERAL
- X MOTION FOR INTERIM APPROVAL OF POST-PETITION SECURED AND SUPER PRIORITY FINANCING PURSUANT TO SECTION 364(c) OF THE BANKRUPTCY CODE
- X MOTION PURSUANT TO 11 U.S.C. § 366, FOR ENTRY OF INTERIM ORDER (1) DETERMINING ADEQUATE ASSURANCE OF PAYMENT FOR FUTURE UTILITY SERVICES AND (2) RESTRAINING UTILITY COMPANIES FROM DISCONTINUING, ALTERING, OR REFUSING SERVICE
- MOTION TO ESTABLISH INTERIM NOTICE PROCEDURES
- X MOTION FOR ORDER APPROVING INTERIM RETENTION OF PROFESSIONALS
- MOTION FOR ORDER APPROVING PAYMENT OF PRE-PETITION CLAIMS OF CERTAIN CRITICAL VENDORS
- OTHERS (LIST):

Copies of all of the foregoing motions are being sent today, May 12, 2015, to the top twenty unsecured creditors, the secured creditor and the U.S. Trustee via facsimile, overnight mail or electronic mail. A certificate of service reflecting the service described above will be filed with the Court prior to the requested hearing.

Dated: May 12, 2015

Respectfully submitted,

By: /s/ Kenneth Stohner, Jr.

Kenneth Stohner, Jr.

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**PROPOSED COUNSEL FOR DEBTORS
AND DEBTORS-IN-POSSESSION
PROTOM INTERNATIONAL, INC. AND
PROTOM INTERNATIONAL, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of May, 2015, a true and correct copy of the foregoing was served via the Court's CM/ECF electronic notification system on all parties requesting same, and via facsimile, email and/or US first class mail, postage prepaid to the parties listed on the attached service list.

/s/ Kenneth Stohner, Jr.

Kenneth Stohner, Jr.

SERVICE LIST

Debtor(s)

ProTom International, LLC
1100 Parker Square, Suite 230
Flower Mound, TX 75028-7459

ProTom International, Inc.
1100 Parker Square, Suite 230
Flower Mound, TX 75028-7459

United States Trustee

Office of the United States Trustee
Earle Cabell Federal Building
1100 Commerce Street, Room 976
Dallas, TX 75242
Fax: 214/ 767-8971

Secured Lender

Michaelson Capital Special
Finance Fund, LP
ATTN: V. Capone
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New York, NY 10017
vcapone@michaelsoncapital.com

20 Largest Unsecured Claims

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